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1 IN THE COURT OF CHANCERY OF THE STATE OF DELAWARE
2 IN AND FOR NEW CASTLE COUNTY

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4 CIRRUS HOLDING COMPANY, LTD. :
5 vs. : C.A. No. 18978
6 CIRRUS INDUSTRIES, INC., AND :
7 AEROGLOBAL CAPITAL MANAGEMENT, :
8 LLC :
9

10 DEPOSITION OF CHRISTOPHER R. MOE, a Witness in the
11 above-entitled cause, taken on behalf of the
12 Plaintiff, before Angela M. Gallogly, RPR, Notary
13 Public in and for the State of Rhode Island, held at
14 43 Cliff Avenue, Newport Rhode Island, on July 10,
15 2001, at 10:00 A.M.

16

-APPEARANCES- :

17 FOR THE PLAINTIFF.....MORRIS, NICHOLAS, ARSHT & TUNNELL
18 BY: WILLIAM M. LAFFERTY, ESQUIRE
19 1201 NORTH MARKET STREET
20 WILMINGTON, DE 19801

21 FOR THE DEFENDANT.....SPECTOR, GADON & ROSEN, P.C.
22 (AEROGLOBAL) BY: TIMOTHY C. RUSSELL, ESQUIRE
23 1635 MARKET STREET - 7TH FLOOR
PHILADELPHIA, PA 19103

24 FOR THE DEFENDANT.....DORSEY & WHITNEY, LLP
(CIRRUS INDUSTRIES) BY: MATTHEW MacKINNON SHORS, ESQ.
PILLSBURY CENTER SOUTH
220 SOUTH SIXTH STREET
MINNEAPOLIS, MN 55402-1498

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26 ALLIED COURT REPORTERS
27 115 PHENIX AVENUE
CRANSTON, RHODE ISLAND 02920
(401) 946-5500

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1 Q. Yes. Does it contain any references?

2 A. No, it does not.

3 Q. Do you, as a matter of practice, communicate via
4 e-mail?

5 A. As compared to what?

6 Q. Compared to fax or mail?

7 A. I communicate with all known technologies.

8 Q. Who are the members of AeroGlobal Capital Management,
9 LLC?

10 A. There are three members; Craig Millard, personally
11 or corporately, I think that's still an open question,
12 Boundary Waters Holdings, and GH Venture Partners,
13 LLC.

14 Q. What is Boundary Waters Holding?

15 A. I don't really know.

16 Q. Do you know who owns it?

17 A. Yes.

18 Q. Who owns it?

19 A. Keith Fitzgerald. I presume it is a personal
20 management or holding company.

21 Q. Does an LLC Agreement exist relating to AeroGlobal
22 Capital Management, LLC?

23 MR. RUSSELL: You mean a formal
24 operating agreement?